

Hunters Point Radiological cleanup – waste handling of asphalt

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Q. What happened?

A. On February 13, 2015, the Navy's contractor moved nine loads of asphalt, which had not been scanned for radiation, to Keller Canyon landfill, which is not permitted to handle radioactive waste. These loads passed scanning by radiation portals at both the Shipyard and at Keller Canyon Landfill without triggering any alarms. Though the Navy has no reason to believe this asphalt is contaminated, the asphalt previous laid on top of soil that did exceed cleanup goals. Therefore the Navy's procedures normally would require scanning the asphalt to remove any doubt before it could go to such a landfill. The Navy's on-site staff caught this concern on the same day and contacted the State of California Department of Public Health (CDPH) and the landfill right away to alert them of this incident. The asphalt and material that it came into contact with are returned to the base. The Navy is arranging to scan the asphalt radiation. Results are likely to be available within the next two months.

Q. Was the public exposed?

A. The Shipyard has multiple layers of checks to make sure you are protected. The trucks carrying the asphalt are required to be covered when they moved the material between the base and Keller Canyon landfill. In the fall after an inspection, the Navy's contractor implemented a new procedure to require that the truck drivers cannot have received their manifests without verification they are covered. All trucks go through a radiation screening portal before they can leave the Base. If the levels of radiation are high enough to trigger an alarm, then the truck must go back and secure any waste material to prevent exposure to the public. On the way back, as an extra precaution, all material was placed into bins that are designed to protect low level radioactive waste. The material is now secured on the base.

Q. How do we know this doesn't happen all the time everywhere? Is this indication of a pattern?

A. EPA trusts our rigorous oversight and review process that has many layers of safeguards. The Navy's own internal routine quality control system caught this issue right away before the information even came to any Agency. They found the errors, reported them, and corrected them. This shows the system is working. In addition, the Navy is investigating the cause of this mistake and is discussing potential new procedures to prevent the reoccurrence of this problem.

Q. How can we trust that the radiation cleanup is protective?

A. Cleanup decisions are only being made using the data that has been either reviewed or resampled. In addition, two independent methods of monitoring radiation are in place. The State of California Department of Public Health does its own independent analysis of the Navy's samples and it also takes confirmation samples and uses its independent laboratory to test radiation samples to confirm the protectiveness of the cleanup. We are continuing to review the resampled data from Tetra Tech as it comes in. We will not approve any cleanup as complete until we are satisfied.

Q. Will EPA punish the contractors and the Navy?

A. Our first priority is to ensure protection of public health and the environment. Tetra Tech and Arcadis are the Navy's contractors. EPA's oversight role is with the Navy. EPA's focus is on compliance and making sure that the cleanup is protective. Based on our discussions with the Navy, the Navy and their contractors are taking effective action to make sure this problem does not happen again. They are still conducting an internal investigation, and the Navy has committed to provide EPA with the report when it becomes available. We will review that carefully when we receive it.

Q. Will EPA fire Arcadis or Tetra Tech? Why did they get contracts again after they had made mistakes before? Isn't that rewarding bad behavior?

A. EPA has a federal oversight relationship with the Navy for this cleanup. Arcadis and Tetra Tech are contractor for the Navy, and it is the Navy's responsibility to manage its contractors through its own contracting process. This includes an evaluation process. I suggest that you contact the Navy directly to address this internal procedure. Please call Thomas Macchiarella at 619-532-0987.

Q. Shouldn't you take away the contractors' licenses?

A. The Nuclear Regulatory Commission and the California Department of Public Health oversee the licensing of radiation cleanup service providers. They are aware of this issue and they are following the normal procedures for followup. For more information related to Tetra Tech's license, contact Diane Scenci at 610-337-5330.

Q. Didn't Tetra Tech send radioactive soil to the wrong landfill in Pittsburgh last February?

A. The Pittsburgh landfill and most other landfills have a radiation monitor that sets off an alarm if a truck with too high a level of radiation tries to drive in. The Nuclear Regulatory Commission (NRC) and the California Department of Public Health (CDPH) inspected Hunters Point last spring and this summer to review radiation cleanup practices. The NRC inspection report is online and I have a copy here. As you see, it addressed this issue and found no concerns related to radioactive soil going the wrong landfill. For more information related to Tetra Tech's license, contact Diane Scenci at 610-337-5330.

Q. I see dust coming from the Navy and from Lennar. What are you doing to stop this?

A. The Navy and the developer are both required to follow dust control measures. The Bay Area Air Quality Management District ("Air District") already has an inspector who goes to the Hunters Point neighborhood every day to do unannounced inspections. In response to community concerns, EPA has recently begun doing unannounced inspections in addition to the routine inspections we have been doing with other agencies for years. We are now working together with the Bay Area Air Quality Management District (BAAQMD) inspectors to monitor dust and truck traffic across the board, not just radioactive waste. The Navy has recently improved its system to better control dust and to ensure trucks carrying any materials are covered. The Navy has increased internal checks, bought better sweeping equipment, improved

coordination among contractors, and increased contract requirements to ensure dust control. If you have any more questions for the Air District, please call John Marvin, the head of enforcement, at 415-749-5190.